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April 24, 2019

BY ECF

The Honorable Joseph A. Dickson
United States Magistrate Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street Room 2D
Newark, New Jersey 07101

Re: *Kyle v. Selective Service System et al.*, Docket No. 2:15-cv-05193-ES-JAD (D.N.J.)

Dear Judge Dickson,

We write in response to the Court's April 2, 2019 minute order, which required the parties to "meet and confer on the need for discovery and on a proposed briefing schedule for the motion for class certification and any anticipated motions for summary judgment." ECF No. 96.

The parties have conferred. We jointly propose that Defendants be given 60 days to conduct discovery related to class certification, followed by three weeks to file their response to Plaintiff's class certification motion. We further propose that Plaintiff then be given two weeks to file any response in support of her motion. Accordingly, the parties propose the following schedule:

April 29, 2019: First day Defendants may serve discovery related to class certification

June 28, 2019: Last day Defendants may conduct discovery related to class certification

July 19, 2019: Defendants file an opposition to Plaintiff's motion for class certification

August 2, 2019: Plaintiff files any reply in support of her motion for class certification

The parties respectfully submit that a schedule for summary judgment should not be set until after the Court rules on class certification, because the class certification ruling may affect issues relevant to summary judgment.

Respectfully submitted,

By: /s/ Matthew Skurnik

MATTHEW SKURNIK

/s/ Michael J. Daher
Michael J. Daher

cc: Michael J. Daher, Esq. (By ECF)
Roy Den Hollander, Esq. (By ECF)